

Case 7:22-cv-07182-VB Document 31 Filed 01/31/23 Page 1 of 2

LAW OFFICES OF JIMMY M. SANTOS,PLLC

Civil Rights, Labor & Employment, & Civil Litigation

Jimmy M. Santos, Esq. Phone (845) 537-7820 Email: jmssesq@gmail.com www.nycivilrightslaw.com 28 Wilson Place Cornwall, New York 12518 Fax: (845) 595-2266

January 31, 2023

VIA ECF

Honorable Vincent L. Briccetti United States District Court Southern District of New York United States Courthouse 300 Quarropas Street White Plains, NY 10601

> Re: <u>Jeanine Cohen v. Westlake Services, et al.</u> Civil Action No. 22-CV-07182 (VB)

Dear Judge Briccetti:

As Your Honor is aware, I represent Plaintiff Ms. Jeanine Cohen in the above-referenced action in which she claims that defendants subjected her to gender discrimination under Title VII, the Equal Pay Act, and the NYS Human Rights Law (the "NYSHRL").

On January 6, 2023, defendants' filed a motion to compel arbitration. After the undersigned requested an extension (which was granted), Plaintiff's date to serve/ file her opposition papers was set for this Friday, February 3, 2023. Pursuant to Sec. 1.(G) of Your Honor's Rules of Practice, on behalf of Plaintiff, and with the consent from defense counsel, the undersigned asks that the deadline to serve/file Plaintiff's opposition papers be extended by an additional week until Friday, February 10, 2023.

On Monday (02/06/23), in another case, <u>Lemus v. Northern Tree, et al</u> before USMJ Krause, I have an inquest hearing for which I'm preparing. Also, the parties herein are in discussions as to whether the issues raised in defendants' motion to compel and/or stay can be narrowed and/or resolved.

This is the undersigned's second request for an adjournment of the deadline for Plaintiff to file her opposition papers, and as set forth above, defense counsel has consented to Plaintiff's making this 2nd request for an extension.

Based on the foregoing reasons, and on behalf of Plaintiff, the undersigned asks that Your Honor grant an extension until February 10, 2023 to have Plaintiff serve/file her opposition papers to defendants' motion to compel arbitration.

Thank you for Your Honor's consideration of this matter.

Respectfully Submitted,

By: /S/ Jimmy M. Santos
Jimmy M. Santos, Esq. (JS-0947)

cc: Craig Dickinson, Esq. (via ECF)